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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION – LOS ANGELES**

Frankel, et al.,

Plaintiffs,

v.

Regents of the University of
California, et al.,

Defendants.

Case No. 2:24-CV-4702-MCS

**PARTIES' STIPULATION
CONTINUING THE HEARING ON
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION;
BRIEFING SCHEDULE STIPULATED
PER LOCAL CIVIL RULES AND
INITIAL STANDING ORDER**

**PROPOSED ORDER FILED
CURRENTLY HEREWITH**

Judge: Hon. Mark C. Scarsi
Courtroom: 7C

PARTIES' STIPULATION TO
CONTINUANCE OF HEARING
CASE NO. 2:24-CV-4702-MCS

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1 **TO THE COURT:**

2 Plaintiffs Yitzchok Frankel; Joshua Ghayoum; and Eden Shemuelian
3 (“Plaintiffs”) and Defendants The Regents of the University of California; Michael
4 V. Drake; Gene D. Block; Darnell Hunt; Michael Beck; Monroe Gorden, Jr.; and
5 Rick Braziel (“Defendants”) (collectively, the “Parties”) hereby submit the
6 following Stipulation to Continue the Hearing on Plaintiffs’ Motion for a
7 Preliminary Injunction (ECF No. 48) (“the Motion”) currently noticed for July 22,
8 2024, along with a Proposed Order filed herewith;

9 WHEREAS, on June 5, 2024, Plaintiffs filed the Complaint in the above-
10 captioned action (ECF No. 1);

11 WHEREAS, on June 17, 2024, Defendants retained O’Melveny & Myers,
12 LLP as counsel in this action, *see* Decl. of Matthew R. Cowan (“Cowan Decl.”) ¶ 3;

13 WHEREAS, on June 24, 2024, Plaintiffs filed the Motion seeking injunctive
14 relief by August 15, 2024 (ECF No. 48);

15 WHEREAS, under Local Civil Rule 7-9 and this Court’s Initial Standing
16 Order, Defendants’ Opposition to Plaintiffs’ Motion is currently due on July 1,
17 2024, which provides Defendants with seven days to draft and file their opposition;

18 WHEREAS, on June 25, 2024, counsel for Defendants contacted counsel for
19 Plaintiffs seeking consent to an intended three-week motion for extension of time to
20 file their opposition in order to have time to adequately investigate and respond to
21 the factual allegations submitted with Plaintiffs’ Motion, which includes four
22 declarations and 70 exhibits, totaling 346 pages, *see* Cowan Decl. ¶ 6;

23 WHEREAS, on June 26, 2024, the Parties agreed to stipulate to a
24 continuance of the Hearing on Plaintiffs’ Motion to July 29, 2024 to accommodate
25 Defendants, Cowan Decl. ¶ 7;

26 WHEREAS, the Parties further agreed to stipulate to a briefing schedule
27 based on the new July 29, 2024 hearing date and consistent with the Local Civil
28 Rule 7-11 and the Court’s Initial Standing Order, Cowan Decl. ¶ 8;

1 WHEREAS, the Parties therefore stipulate to the new hearing date and
2 briefing schedule below:

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4 July 8, 2024	Defendants' Opposition to the Motion due
5 July 15, 2024	Plaintiffs' Reply in Support of the Motion due
6 July 29, 2024	Hearing of the Motion

7 WHEREAS, the Parties believe that the requested continuance complies with
8 the spirit of the directive of this Court's Initial Standing Order, which states that
9 "[c]ounsel should avoid submitting requests for a continuance fewer than seven
10 calendar days prior to the earliest date subject to request," because, although the
11 opposition is due on July 1, 2024, the current hearing date is not until July 22,
12 2024;

13 **THEREFORE, IT IS HEREBY STIPULATED**, by and between the
14 Parties, that the hearing on Plaintiffs' Motion for a Preliminary Injunction shall be
15 continued to July 29, 2024.

16 **THE PARTIES FURTHER STIPULATE**, that Defendants' opposition to
17 the Motion is due on July 8, 2024 and Plaintiffs' reply in support of their Motion is
18 due on July 15, 2024.

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1 Dated: June 27, 2024

Respectfully submitted,

2 By: /s/ Matthew R. Cowan

3 MATTHEW R. COWAN
4 *Attorney for Defendants The Regents of*
5 *the University of California; Michael V.*
6 *Drake; Gene D. Block; Darnell Hunt;*
7 *Michael Beck; Monroe Gorden, Jr.;*
8 *and Rick Braziel*

9 /s/ ERIC C. RASSBACH

10 ERIC C. RASSBACH
11 *Attorney for Plaintiffs Yitzchok*
12 *Frankel; Joshua Ghayoum; and Eden*
13 *Shemuelian*

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4, I hereby attest that the other signature listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: June 27, 2024

Respectfully submitted,

By: /s/ Matthew R. Cowan

MATTHEW R. COWAN

*Attorney for Defendants The Regents of
the University of California; Michael V.
Drake; Gene D. Block; Darnell Hunt;
Michael Beck; Monroe Gorden, Jr.;
and Rick Braziel*